

## REMARKS

Claims 1 and 3-24 are pending in the present application and stand rejected. The Examiner's reconsideration is respectfully requested in view of the following remarks.

Claims 3, 4 and 7 have been amended to correct minor grammatical informalities.

Claims 1, 3, 5-13 and 15-24 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Gillick et al (U.S. Patent No. 6,167,377) (hereinafter "Gillick"). The rejections are respectfully traversed.

The Examiner cites col. 17, lines 39-41 of Gillick as anticipating "determining a set of coefficients to be used to combine the language model scores." Applicants respectfully disagree.

The recited portion of Gillick simply states that "[t]he first language model is a bigram model that indicates the frequency with which a word occurs in the context of a preceding word." The recited portion of Gillick clearly does not disclose "determining *a set of coefficients*," much less "to *combine* the language model scores." The recited portion of Gillick also does not disclose "based on a context of the current word," also as claimed in claim 1.

Applicants would like to point out the portion of Gillick which discloses a method of combining two language models; this portion is clearly patentably distinguishable from the instant claims. Col. 16, lines 26-40 of Gillick discloses a method of *updating* weights (*i.e.*, lambda values) of language models at runtime by putting *more* weight on the model that produces more accurate results. A relevance factor R is used to control the contribution of previous weights in producing the new weights. This is shown in detail by the equations on col. 16, lines 35-40. This is the *only* portion of Gillick that discloses

combining language models. Clearly, Gillick proposes an entirely different method of combining language models than claimed in claim 1. In particular, the method disclosed by Gillick does not use or discuss the context of the word to be determined.

The Examiner asserts that because “Gillick discloses dividing the *spoken* utterance,” Gillick also discloses “dividing text data for training a plurality of sets of coefficients,” as claimed in claim 1. The Examiner does not address the Applicants original argument that a “spoken utterance” is clearly not anticipated by “*text* data,” even in its broadest *reasonable* interpretation. In particular, *text* is clearly distinguishable from a *spoken* utterance. The concept of the “spoken utterance” is claimed in “a word sequence *uttered by a speaker*,” as claimed in claim 1.

Further, claim 1 clearly claims “dividing text data *for training a plurality of sets of coefficients*.” As was argued above, Gillick does not disclose anything remotely related to “sets of coefficients.” Gillick proposes an entirely different and unrelated method for combining language models. Thus, even assuming, *arguendo*, that dividing spoken utterances, as disclosed in Gillick, somehow anticipated “dividing text data,” Gillick does not clearly does not anticipate “dividing text data *for training a plurality of sets of coefficients*.”

Regarding claims 11 and 19, the Examiner states that “[a]lthough the particular section does not specifically disclose that each of the n-weights depend on n-gram history counts, Gillick does teach n-gram’s being the number of occurrences of the given n-gram (word frequency.” The Examiner seemingly has “history n-gram counts,” as claimed in claims 11 and 19, confused with counts of a given n-gram.

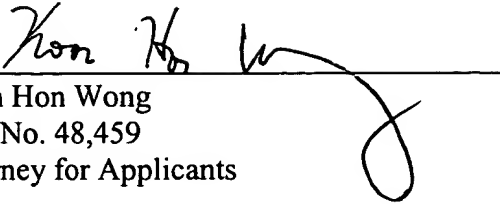
As shown in page 3, lines 1-2 of the Specification, the “count of a given n-gram is the number of occurrences of the given n-gram in the corpus (word frequency).” However, a “*history* n-gram” refers to the history (*i.e.*, the previous words) of the current word being determined. (Specification, p. 20, lines 10-22). Thus, in the example shown on p. 20, lines 10-22 of the Specification, a trigram model (w\_1, w\_2, w\_3) would have a bigram history (w\_1, w\_2) for determining the current word w\_3.

As previously discussed, Gillick uses a completely different and unrelated method of combining language models. As such, Gillick does not disclose the concept of “*history* n-grams,” as claimed in claims 11 and 19.

Accordingly, claims 1, 11 and 19 are believed to be patentably distinguishable from Gillick. Dependent claims 3, 5-10, 12-13, 15-18 and 20-24 are believed to be allowable for at least the reasons given for claims 1, 11 and 19, as depending from allowable claims. Claims 4 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gillick in view of Goldenthal (U.S. Patent No. 6,625,749). Because claims 4 and 14 also depend from allowable claims 1 and 11, respectively, it follows that claims 4 and 14 are also believed to be allowable. Withdrawal of the rejection of claims 1 and 3-24 is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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